

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA
PLAINTIFF,**

CASE #: 11-20129

VS.

HON. ROBERT H. CLELAND

**SCOTT PERKINS
DEFENDANT.**

AUSA Saima S. Mohsin
U.S. Attorney's Office
211 W. Fort Street, Suite 2001
Detroit, MI 48226
(313) 226-9100

Margaret Sind Raben
Gurewitz & Raben, PLC
333 W. Fort Street, Suite 1100
Detroit, MI 48226
(313) 628-4708

**REQUESTS AND NOTICES IN COMPLIANCE WITH
STANDING ORDER FOR DISCOVERY AND INSPECTION**

In compliance with the Standing Order for Discovery and Inspection, Defendant Scott Thomas Perkins, through his attorney, Margaret Sind Raben, provides the Government with the following Requests and Notices:

1. Defendant Perkins requests the Government provide copies, or an opportunity to make copies, of:
 - a) Any information within the meaning of the "Standing Order," paragraph 1(a) or Rule 16(a)(1) of the Federal Rules of Criminal Procedure.
 - b) A written summary of any expert testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Criminal Evidence during its case-in-chief at trial. This summary must describe the proposed expert witnesses' qualifications. Rule 16(a)(1)(G).
 - c) Any exculpatory evidence within the meaning of the "Standing Order," paragraph

1(b) and/or *Brady v. Maryland*, 373 US (1963) and *United States v. Agurs*, 427 US 97 (1976).

- d) Any document which will be used to refresh the memory of a witness within the meaning of the “Standing Order,” paragraph 8, and/or Rule 612 of the Federal Rules of Evidence.
 - e) Any statement by persons who have possible knowledge or information relative to this case which are not protected from disclosure from 18 USC §3500.
 - f) Any statement of witnesses within the meaning of 18 USC §3500(e).
2. Pursuant to the “Standing Order,” paragraph 5(b), Defendant notifies the Government that the foundation for any and all exhibits will be contested.
 3. Pursuant to the “Standing Order,” paragraph 6, Defendant notifies the Government that the chain of custody of any and all exhibits will be contested.
 4. Pursuant to the “Standing Order,” paragraph 7, Defendant notifies the Government that any scientific analysis or summary testimony by experts will be contested unless there has been a proper basis for the witness’s testimony under Rule 1006 of the Federal Rules of Evidence.
 5. All requests for information, materials or evidence are continuing and the prosecution is expected to immediately provide any additional information, materials or evidence as required by the “Standing Order,” paragraph 3, and/or Rule 16(c) of the Federal Rules of Criminal Procedure.
 6. The Notices contained herein will remain in effect unless expressly withdrawn.

Respectfully Submitted,

GUREWITZ & RABEN, PLC

By: s/Margaret Sind Raben
333 W. Fort Street, 11th floor
Detroit, MI 48226
(313) 628-4708
Email: msraben@aol.com
Attorney Bar Number: 39243

Date: July 27, 2012

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2012, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

s/Margaret Sind Raben (P39243)
Gurewitz & Raben, PLC
333 W. Fort Street, Suite 1100
Detroit, MI 48226
(313) 628-4708
email: msraben@aol.com